

UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

<i>In re:</i>	:	Chapter 11
	:	Case No. 15-11648 (AMC)
	:	(Jointly Administered)
Mayur Patel, <i>et al.</i> ,	:	
	:	Hearing Date: July 24, 2017
Debtors.	:	Hearing Time: 11:00 a.m.
	:	Hearing Place: Courtroom #5

STIPULATION ADJOURNING HEARING ON DEBTOR'S MOTION TO APPROVE
DISCLOSURE STATEMENT

THIS STIPULATION is made as of the 19th day of July 2017, by and between Mayur Patel ("Patel") and SJM Limited, LLC (SJM or in conjunction with Patel, the "Debtors"), Toroni Real Estate Partnership ("Toroni") and the Capital One, N.A. ("Capital One"), by and through their respective counsel:

WHEREAS, on March 10, 2015 (the "Patel Petition Date") Patel filed voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (as amended, the "Bankruptcy Code").

WHEREAS, on March 19, 2015 (the "SJM Petition Date") SJM filed voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

WHEREAS, on or about May 12, 2017, the Debtors filed their First Amended Joint Plan of Reorganization and Disclosure Statement and a hearing on approval of the Disclosure Statement was scheduled for July 24, 2017.

WHEREAS, on or about July 14, 2017, Capital One filed an objection to the Debtors' Disclosure Statement.

WHEREAS, the Debtor and Toroni are currently engaged in good faith negotiations in an attempt to resolve certain concerns Toroni has with the Plan.

WHEREAS, in light of the current settlement negotiations, the parties have agreed to adjourn the hearing on the Motion to Approve Disclosure Statement (the "Motion").


WHEREAS, the Parties, by and through their respective counsel, HEREBY AGREE AND STIPULATE:¹

1. The hearing on the Motion is hereby adjourned from July 24, 2017 at 11:00 a.m. to August 7, 2017 at 11:00.
2. The deadline to file an objection to the Motion is hereby extended from July 17, 2017 to July 31, 2017.
3. This Stipulation is subject to and conditioned upon approval by the Bankruptcy Court.
4. The undersigned representatives and/or counsel represent that they have full power and authority to execute this Stipulation on behalf of their respective clients and to bind them to the terms and provisions herein.
5. The Parties request that the Bankruptcy Court enter an Order approving this Stipulation.
6. This Stipulation contains the entire agreement between the parties and may only be amended in writing, executed by both parties hereto.

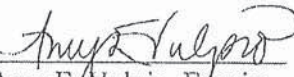
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¹ Pursuant to Local Bankruptcy Rule 9019-1, to the extent it is applicable, the undersigned respectfully seek the entry of this stipulation as an order without the full notice and hearing required in Federal Rules of Bankruptcy Procedure 9019 and 2002 because there is insufficient time to fulfill said notice and hearing requirements. See L.B.R. 9019-1.


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SO ORDERED this 24th day of ~~June~~^{July}, 2017



Honorable Ashely M. Chan
United State Bankruptcy Judge